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March 22, 2001

BY OVERNIGHT COURIER

The Honorable William M. Nickerson
United States District Court
101 West Lombard Street
Baltimore, MD 21201

Re: *In re O.C. Rocket LLC*
U.S.D.C., District of Maryland
Civil Action No.: WMN 00-2892
Our File No. 9465-077

Dear Judge Nickerson:

Subsequent to the issuance of the Court's Scheduling Order dated January 24, 2001, the parties have encountered a number of difficulties in regard to discovery. Among other things, certain employees of Petitioner O.C. Rocket are seasonal workers who will not be available until later this Spring, and medical records and depositions must be obtained from plaintiffs' medical providers located in New York. In addition, the existing schedule calls for Petitioner to be the first party to provide expert disclosures, and the parties agree that the schedule should be modified so that Claimants will first provide expert disclosures and reports, after having sufficient time to obtain the necessary documents and deposition testimony.

For these reasons, the parties have conferred and respectfully submit this joint request that the Court enter a Revised Scheduling Order, as follows:

Rule 26(e)(2) supplementation of disclosures and responses	July 15, 2001
Discovery deadline	July 31, 2001
Request for Admissions	August 7, 2001
Claimants' expert reports	August 31, 2001
Petitioner's expert reports	September 28, 2001
and submission of status report	
Dispositive motions	October 15, 2001

" *APPROVED* " THIS *26th* DAY
OF *March*, 20 *01*

William M. Nickerson
UNITED STATES DISTRICT JUDGE


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We apologize for troubling the Court with these matters, but the parties believe this proposed schedule will reasonably enable them to fulfill their respective discovery obligations within the least amount of time.

Respectfully yours,

PALMER BIEZUP & HENDERSON

By: 
Stephen M. Calder

SMC/sp

cc: David Skeen, Esq.
Matt R. Ballenger, Esq.